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Counsel for Bruce E. Robinson, Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE: WILLIAM ANDREW KARO,

Case No. 13-33011

Chapter 7

Debtor.

**NOTICE OF MOTION TO APPROVE
COMPROMISE WITH PAGE KARO AND W.A.K., II**

PLEASE TAKE NOTICE that Bruce E. Robinson, (the “Trustee”), Trustee for the Bankruptcy Estate of William Andrew Karo, (the “Debtor”), by counsel, has filed a *Motion to Approve Compromise with Page Karo and W.A.K., II* (the “Motion”). The Motion is on file in the office of the Clerk of the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, United States Courthouse, 701 East Broad Street, Richmond, Virginia and may be reviewed by any party in interest during normal business hours. You may also review the Motion via the Internet at <http://vaeb.uscourts.gov> or by contacting the attorney below.

The Trustee seeks to compromise a claim he has against Page Karo and her son, known as “WAK” (collectively “Defendants”). The claim relates to a disclaimer executed by the Debtor in which the Debtor attempted to transfer his interest in a family trust to WAK. The Trust was liquidated and approximately \$458,237.40 was deposited into accounts controlled by Defendants; however, most of the funds have been spent. The Trustee has engaged in in-depth fact finding to determine the likelihood of a recovery against Page Karo and WAK. After extensive negotiations, the parties reached a compromise in which the Trustee agrees to accept \$50,000.00 in full and final settlement of any and all claims by the Trustee against Defendants (the “Settlement”).

In exercising his business judgment, the Trustee believes the Settlement is fair and equitable and in the best interest of the Debtor’s bankruptcy estate and creditors. Based on the existing case law and the unique circumstances, it is uncertain how the Court would resolve the dispute. Further, a substantial portion of the funds were spent and there is little prospect of a further recovery from the Defendants. The Settlement was reached after analysis of pending issues, conducting significant research and due diligence, back and forth negotiations between the Trustee and the Defendants, and after taking into consideration the time, expense and risk of fully litigating these matters before the Court. The unique circumstances underlying the dispute and intersecting legal issues make the litigation more complex. The Settlement with the Defendants is reasonable because it allows the Trustee to obtain a guaranteed recovery without delay and avoids the potentially large administrative expenses of litigation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then you or your attorney must:

1. File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 9013-1 *within 21 days of the filing of the Motion.*

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

2. You must also mail a copy to:

Jeremy S. Williams, Esquire
Kutak Rock LLP
1111 East Main Street, Suite 800
Richmond, VA 23219

3. No hearing has been set on this matter. If an objection is filed, a hearing will be scheduled and you will receive notice of such hearing. In addition to filing a written objection to the motion you must attend the hearing. If you fail to file timely a written response and to attend the hearing, the Court may consider any objection you may have waived and enter an Order granting the relief requested in the motion.

BRUCE E. ROBINSON, TRUSTEE

By: /s/ Jeremy S. Williams
Counsel

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on November 11, 2015, a true and exact copy of the foregoing document was forwarded to all necessary parties via the Court's ECF system or by first class mail, postage prepaid, on all parties on the attached service list, and to:

U.S. Trustee's Office

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